

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD/SN)
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This document relates to: *Estate of John P. O'Neill, Sr., et al. v. The Republic of Iraq, et al.*,
04-cv-1076 (GBD)(SN)

**DECLARATION OF JERRY S. GOLDMAN, ESQ. IN SUPPORT OF MOTION TO ADD
ADDITIONAL PLAINTIFFS AGAINST THE TALIBAN**

I, Jerry S. Goldman, Esq., declare under penalty of perjury, as provided for by 28 U.S.C. § 1746, that the following statements are true and correct:

1. I am a shareholder at Anderson Kill P.C., attorneys for Plaintiffs the Estate of John P. O'Neill, Sr., John P. O'Neill, Jr., Christine O'Neill, Carol O'Neill, the Estate of Dorothy O'Neill ("O'Neill Plaintiffs"); Plaintiffs added as parties pursuant to the Court's May 4, 2022, June 15, 2022, June 28, 2022 and August 30, 2022 Orders (ECF Nos. 7949, 8111, 8150, and 8473); and, the eight (8) proposed Additional Plaintiffs listed in Appendix 1 to Exhibit A, beginning at number 3,131 (collectively, "Plaintiffs") in the above-captioned action. I am familiar with the facts and circumstances of this case and am admitted to practice in this Court.

2. Attached hereto as Exhibit A is a true and correct copy of the Proposed Fifth Amended First Consolidated Complaint. Appendix 1 to Exhibit A, starting at number 3,131 lists the eight (8) proposed Additional Plaintiffs ("Additional Plaintiffs"). All other Plaintiffs listed on Appendix 1 were already added to the case pursuant to the Court's May 4, 2022, June 15, 2022, June 28, 2022, and August 30 Orders (ECF Nos. 7949, 8111, 8150, and 8473).

3. While Anderson Kill P.C. intended to cease accepting new clients against the Taliban at the end of the spring, several individuals subsequently contacted undersigned counsel and requested to join the litigation.

4. If this motion is granted, undersigned counsel intends to quickly file an amended complaint adding these additional plaintiffs as parties against the Taliban and to promptly move for a judgment against the Taliban on behalf of these additional plaintiffs.

WHEREFORE, Plaintiffs respectfully request that the Court grant this Motion to Add Additional Plaintiffs Against the Taliban.

Dated: October 28, 2022
New York, New York

/s/ Jerry S. Goldman

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